

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
SECURITIES AND EXCHANGE COMMISSION, :
:
Plaintiff, : 17 Civ. 7007 (CBA)
:
- against - : ECF Case
:
PLEXCORPS :
(a/k/a and d/b/a PLEXCOIN and SIDEPAY.CA), :
DOMINIC LACROIX and :
SABRINA PARADIS-ROYER, :
:
Defendants, :
:
-----x

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties that:

1. Pursuant to the Court's Minute Order and Minute Entry filed on January 9, 2018 (the "Minute Order"), the parties will conduct discovery on the Court's personal jurisdiction through April 13, 2018.
2. Defendants' brief in support of its motion to dismiss this action on personal jurisdiction grounds shall be due April 27, 2018.
3. Plaintiff's brief in opposition to Defendants' motion to dismiss shall be due May 25, 2018.
4. Defendants' reply brief shall be due June 8, 2018.
5. If approved by the Court, the hearing currently set for March 5, 2018, is hereby adjourned.

6. Should this action remain pending upon resolution of Defendants' motion to dismiss, the parties shall file within three (3) business days of that resolution a proposed schedule to resume the deadlines set forth in the Temporary Restraining Order, and Order Freezing Assets and Granting Other Relief dated December 1, 2017 (the "OSC") (DE #10) and the terms of the Stipulation and Order dated December 8, 2017 (the "Stipulation and Order") (DE #19), currently stayed by the Minute Order including dates for (a) the submission of the documents required by Paragraph 5 of the Stipulation and Order; (b) the submission of a sworn verified accounting ordered by Paragraph XII of the OSC; (c) the opposing papers in response to the OSC ordered by Paragraph XIV of the OSC; (d) the Commission's reply papers ordered by Paragraph XV of the OSC; and (e) the hearing on the order to show cause ordered by Paragraph I of the OSC.

7. If approved by the Court, the following orders shall be extended up and until the conclusion of the hearing on the order to show cause as set forth in paragraph 6 herein, or until such date as the Court has held the preliminary injunction hearing contemplated by the OSC, or until such time as the Court modifies any portion of the order based on a joint stipulation by the parties:

- a. The temporary restraining orders imposed by paragraphs V, VI, and VII of the OSC;
- b. The asset freeze imposed by paragraph VIII of the OSC;
- c. The repatriation order imposed by paragraph IX of the OSC; and
- d. The order against destruction of documents imposed by paragraph X of the OSC.

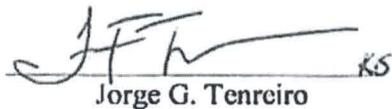
8. Nothing in this stipulation shall be construed as affecting the Defendants' rights as to any jurisdictional issues, or to make jurisdictional challenges in this action.

9. Nothing in this stipulation shall be construed as affecting the parties' rights and responsibilities under all other parts of the OSC, including but not limited to the Commission's right to pursue third-party discovery as per the terms of paragraph XI of the OSC.

Dated: New York, New York
January 11, 2018

SECURITIES AND EXCHANGE COMMISSION

By:



JG
Jorge G. Tenreiro

200 Vesey Street, Suite 400
New York, NY 10281
(212) 336-9145 (Tenreiro)

Attorney for Plaintiff

MORRISON COHEN LLP

By:



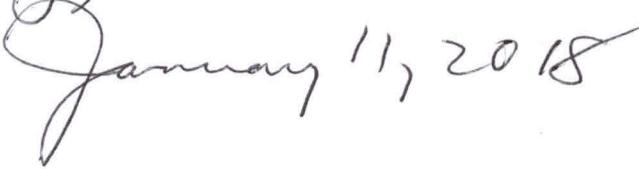
Jason Gottlieb

909 Third Avenue
New York, NY 10022
(212) 735-8837
jgottlieb@morrisoncohen.com

Attorneys for Defendants Dominic-Lacroix; and
Sabrina Paradis-Royer

SO ORDERED:


UNITED STATES DISTRICT JUDGE



January 11, 2018